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BY MAIL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
DIVISION

FILED

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U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

MR. DAMAL J. TURNER )

#136901 )

(Enter above the full name of the  
Plaintiff in this action. Include prison  
registration number.) )

v. )

ST. LOUIS CITY SHERIFFS OFFICE )

4:17CV2280 DDN

Case No. \_\_\_\_\_

(To be assigned by Clerk)

"JURY TRIAL DEMANDED"

In what capacity are you suing the  
defendants?

- ☐ Official  
☐ Individual  
☒ Both

(Enter above the full name of ALL Defend-  
ant(s) in this action. Fed. R. Civ. P. 10(a)  
requires that the caption of the complaint  
include the names of all the parties. Merely  
listing one party and "et al." is insufficient.  
Please attach additional sheets if necessary. )

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

I. PLACE OF PRESENT CONFINEMENT: CRIMINAL JUSTICE CENTER

200 S. TUCKER BLVD ST. LOUIS, MO 63102

II. PREVIOUS CIVIL ACTIONS:

A. Have you brought any other civil actions in state or federal court dealing with the  
same facts involved in this action or otherwise relating to your confinement?

YES [ ]

NO [✓]

- B. If your answer to "A" is YES, describe the action(s) in the space below. If there is more than one action, you must describe the additional action(s) on a separate piece of paper, using the same format as below.

1. Parties to previous civil action:

Plaintiff \_\_\_\_\_

Defendant(s): \_\_\_\_\_

2. Court where filed: \_\_\_\_\_

3. Docket or case number: \_\_\_\_\_

4. Name of Judge: \_\_\_\_\_

5. Basic claim made: \_\_\_\_\_

6. Present disposition (Is the case still pending? Is it closed? If closed, was it appealed?): \_\_\_\_\_

III. GRIEVANCE PROCEDURES:

- A. Is there a prisoner grievance procedure at the institution in which you are incarcerated?

YES ☒

NO ☐

- B. Have you presented this grievance system the facts which are at issue in this complaint?

YES ☐

NO ☒

C. If your answer to "B" is YES, what steps did you take: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

D. If your answer to "B" is NO, explain why you have not used the grievance system:

no grievance has been filed because there is no grievance  
procedure available to file on the Sheriffs Department that  
would remedy the damage already done.

IV. PARTIES TO THIS ACTION:

A. Plaintiff

1. Name of Plaintiff MR. DAMAL J. TURNER
2. Plaintiff's address: 1216 WILMINGTON ST APT 2F. ST. LOUIS, MO 63101
3. Registration number: #136901

B. Defendant(s)

1. Name of Defendant: ST. LOUIS CITY SHERIFFS OFFICE
2. Defendant's address: 10 N. Tucker blud - 8<sup>th</sup> Fl, ST LOUIS, mo 63101
3. Defendant's employer and job title: \_\_\_\_\_  
\_\_\_\_\_
4. Additional Defendant(s) and address(es): Same  
\_\_\_\_\_  
\_\_\_\_\_

V. COUNSEL

A. Do you have an attorney to represent you in this action?

YES [ ]

NO [✓]

B. If your answer to "A" is NO, have you made an effort to contact an attorney to represent you in this matter?

YES [✓]

NO [ ]

C. If your answer to "B" is YES, state the name(s) and address(es) of the attorneys you contacted and the results of those efforts:

SHAWN GLOULET

230 SOUTH REMISTON SUITE 410

CLAYTON, MO 63105

D. If your answer to "B" is NO, explain why you have not made such efforts:

E. Have you previously been represented by counsel in a civil action in this Court?

YES [ ]

NO [✓]

F. If your answer to "E" is YES, state the attorney's name and address:

- VI. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. State your claims in numbered paragraphs. You may use additional paper if necessary):

Prior to my father Duane Turner passing suddenly and unexpectedly on the 3rd day of June 2017. HE and I Just spoke a few days before this happened. We talked about starting a painting company together because he knew thats what I like to do. On the 3rd day of June 2017, my father passed away from a heart attack at his apartment in East Alton IL. I was notified by the caseworker Mrs. Teoupe, at the St Louis City Justice Center On the 4<sup>th</sup> day of June 2017, that my father had passed away. She let me call my attorney, Sean Milford and I left him a message on his answer machine. On the 12<sup>th</sup> day of June 2017 I spoke with my Attorney Sean Milford, who successfully filed a motion requesting an order that I be allowed to view my fathers body post mortem at Serenity Memorial Chapel location 3416 West Main st in Belleville, IL 62226, to obtain closure and say my last good-byes for emotional solace and spiritual completion.

On the 14<sup>th</sup> day of June 2017, My 8<sup>th</sup> Amendent → see Attachment

Continuing From Page(5)

right to be free from cruel and unusual punishment for my mental and physical anxiety, distress heartbreak and soulful despair over being denied an opportunity to obtain closure by properly grieving and 14<sup>th</sup> Amendment right to due process and equal protection under the law, to the United States Constitution.

There is no security concern where Reginald Clemons was at a maximum security level five prison and it was broadcast on the news that he was allowed to view his brother's body from Potosi Correctional Center to Natural Bridge and Lucas Hunt.

My rights were violated by the St. Louis City Sheriffs Office, when they refused to obey the court order issued by Judge Barbara Peebles in division 26 of the St. Louis City Courts.

The defendants to this law suit stated that its not there issue and this action by the defendant violated my 8<sup>th</sup> Amendment right to be free from cruel and unusual punishment. While also clearly violating an order of the court and my equal due process rights under the law.

VII. RELIEF

State briefly and exactly what you want the Court to do for you. Do not make legal arguments. (Note: If you are a state prisoner and you seek from this Court relief that affects the length or duration of your imprisonment, your case must be filed on a § 2254 form.)

Punitive damages to be assessed by the court  
at near or above \$5,000,000.00 dollars and  
nominal damages of \$1.00

VIII. MONEY DAMAGES:

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES ☒

NO ☐

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

\$5,000,000.00 My Constitution rights were violated  
and so was the Court order. My Father meant the world  
to me and its a Chapter that will not be close due to not saying  
my last words.

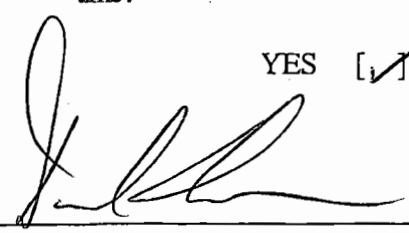
IX. Do you claim that the wrongs alleged in the complaint are continuing to occur at the present time?

YES

☒

NO

☐

  
Signature of attorney or pro se Plaintiff

8/10/2017  
Date